

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

MRI SOFTWARE LLC)	
)	Civil Action No. 1:12-cv-01082-CAB
Plaintiff,)	
)	
v.)	
)	Judge Christopher A. Boyko
LYNX SYSTEMS, INC.)	
)	
Defendant.)	
)	

DECLARATION OF PATRICK GHILANI

Under penalty of perjury, I, Patrick J. Ghilani, declare as follows:

1. I am over 18 years of age and competent to make this declaration. Each of the facts stated herein is true and based upon my personal knowledge.
2. I am Chief Operating Officer for MRI Software LLC ("MRI"), in which capacity I oversee the operations of MRI as part of the executive management team..
3. As a software vendor, MRI's software products are the core of our business.
4. The source code of our products defines their functionality and inner workings, making it a key business differentiator versus competing products. As such, the source code is an extremely valuable asset of our company.
5. If MRI's source code were to be obtained by a third party, that code could be used to duplicate our product offerings, find and take advantage of security vulnerabilities in our product (resulting in data theft, service level breaches, or compromised functionality), or reveal important aspects of our offerings that could be leveraged by our competitors. Any one of these

possibilities could have serious, irreparable and possibly devastating repercussions to MRI's ability to do business.

6. Because of these dangers, MRI employs a team to manage our source code to maintain its integrity and to control access. We also employ a source control management system that allows us to closely restrict and monitor access so that only approved users providing valid credentials can even view our source code.

7. In addition, all of our employees, including those managing the source code, are under an obligation of confidentiality through their employment agreements with MRI.

8. These controls and others ensure that the MRI source code is safely maintained as a trade secret.


9. Safe handling of MRI's source code is also a requirement of certain protocols and standards. For example, MRI maintains and adheres to an internal information security policy that further obligates MRI and manages its employees' use and handling of confidential, secret and sensitive information, which would include the handling process of the source code. The adherence to this policy directly affects MRI's certification with the European Commission's Directive on Data Protection ("Safe Harbor") protocols.

10. MRI is also certified annually in accordance with Statement on Standard for Attestation Engagements (SSAE) 16, for which MRI provides audited assurances that it has and is maintaining the secure operation and integrity of its software in its hosted environment.

11. MRI's continued adherence to the foregoing protocols and standards is important to MRI's ability to conduct business in the United States and abroad.

Executed this 23rd day of September, 2013

By:



Patrick J. Ghilani